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EXECUTIVE SECRETARY

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June 14, 1999

By [HAND]

David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

*Re: Docket No. 99-00280
Revised AT&T-TCG Toll Dialing Parity Implementation Plan*

Dear Mr. Waddell:

Please find enclosed for filing the original and 13 copies of AT&T's and TCG's Revised Toll Dialing Parity Implementation Plans, along with AT&T's Petition for Waiver.

Sincerely,

A handwritten signature in cursive script that reads "Jim Lamoureux".
Jim Lamoureux

Encls.

AT&T Digital Link Service Dialing Parity Implementation Plan

AT&T hereby files this Dialing Parity Implementation Plan in accordance with the Federal Communications Commission Order released on March 23, 1999, in Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, NSD File No. 98-121. This Plan sets forth AT&T's proposal for providing intraLATA toll dialing parity within the state of Tennessee for customers subscribing to AT&T Digital Link Service.

Methodology: AT&T will provide full 2-PIC (intraLATA toll & interLATA) dialing parity, allowing AT&T Digital Link Service customers to pre-subscribe to one carrier for all interLATA calls and to the same or another carrier for all intraLATA toll calls. One interLATA IXC and one intraLATA IXC may be selected for each trunk subgroup. AT&T will convert all its central offices on a statewide basis. AT&T will provide the capability for pre-subscription, however subscribers must reprogram their PBX to send their traffic to their selected carrier in order for the presubscribed choice to be effective. (Because AT&T's 4ESS will not have the capability to accommodate a "No PIC" until the first quarter of 2000, see the attached Petition for Waiver.)

Availability: AT&T will provide full 2-PIC dialing parity in each LATA in which AT&T offers AT&T Digital Link Service. AT&T Digital Link is offered in all exchanges and LATAs in Tennessee in which AT&T is authorized to provide local and intraLATA toll services.

Subscriber Practices: AT&T will inform new AT&T nodal services and AT&T Digital Link Service customers (i.e., customers that subscribe to local and long distance services on the same day) of the dialing parity feature available to them and, upon request, will provide customers a randomly ordered list of carriers available to them in their geographic area. If the new customer does not indicate a preference for an alternate carrier, interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will be carried over AT&T's network as part of the subscribers' new nodal agreement.

AT&T will utilize competitively neutral business office practices when an existing AT&T Digital Link Service subscriber contacts AT&T to request information on dialing parity or to change to an alternate intraLATA toll and/or interLATA provider. Upon request, AT&T will provide Customers a randomly ordered list of carriers available to them in their geographic area. Existing subscribers who do not affirmatively select an alternative provider will remain with their pre-existing intraLATA toll and interLATA carrier. Unless an existing AT&T Digital Link Service subscriber requests a change to their presubscribed interexchange carrier ("PIC") or to their presubscribed interLATA toll carrier ("PTC"), any

interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will continue to be carried over AT&T's network.

AT&T will accept Customer-initiated or carrier-initiated requests for alternate interLATA or intraLATA toll carrier on the date of implementation. If all necessary access facilities already exist, the PIC/PTC selection will be processed within three business days. Should the installation of new access facilities (e.g., from the AT&T switch to the LEC access tandem or from the customer premises to the AT&T switch) be required, the PIC/PTC selection will be completed within three business days of the new facilities being fully provisioned and operational. The new facilities will be provisioned within standard provisioning intervals.

At this time, AT&T will not impose charges on its customers for pre-subscribing to an alternate carrier or for changing their PIC/PTC selection.

AT&T will provide notice to its AT&T Digital Link Service subscribers of the forthcoming availability of intraLATA toll and interLATA dialing parity by means of a one-time mailing, a copy of which is attached as Exhibit 1. This mailing will be sent 15 days prior to the implementation of dialing parity, provided that at least one ASR has been received from an alternate carrier.

Carrier Practices: Any interexchange carrier that wishes to be listed as a provider of intraLATA toll or interLATA service at the time of dialing parity implementation shall notify AT&T no later than 30 days prior to dialing parity availability. Access Service Request ("ASR") requirements are available from the AT&T Carrier Service Center. AT&T will implement ASRs that require the installation of new access facilities in accordance with standard provisioning intervals. AT&T will not implement a cost recovery plan at this time. In addition, AT&T will not impose a PIC Change Charge on ADL customers. In keeping with the TRA's anti-slamming rules, AT&T will adhere to the TRA anti-slamming rules and implement a PIC freeze moratorium for 180 days. AT&T will comply with all rules imposed by the FCC and the TRA.

Proposed Implementation Schedule: AT&T will implement dialing parity no later than 30 days after the date of the Order in which this plan is approved.

AT&T also provides AT&T Business Local Service ("BLS") within the State of Tennessee. Because AT&T BLS is provided over facilities acquired by AT&T in its merger with Teleport Communications Group ("TCG"), AT&T will implement dialing parity for AT&T BLS customers in accordance with the dialing parity plan filed by TCG.

Date

Dear Customer,

As a valued AT&T Digital Link customer we are pleased to announce an enhancement to your AT&T Digital Link Service: the availability of intraLATA toll and interLATA (including international) pre-subscription. Pre-Subscription gives you the opportunity to choose an alternate carrier to complete your intraLATA toll and/or interLATA calls.

AT&T currently completes your intraLATA toll and 1+ interLATA calls, and will continue to be your long distance company unless you choose otherwise.

Other companies will solicit your intraLATA toll and interLATA business. Before making a change, however, please remember that each company's rates, plans and policies are different. If you wish to make a change, please contact our business office. You should also contact the long distance company you have chosen to ensure your account is properly established. This feature is available to you effective [insert date]. AT&T will not impose any charges for this feature.

As always, we are grateful for your continued business. If you have any questions or wish to make a change, please contact our business office at 1-877-325-5968 on or after [insert date].

Sincerely,

AT&T Local Services

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

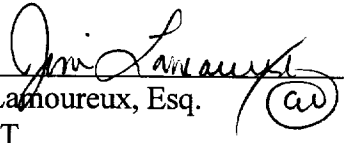
**REQUEST OF AT&T COMMUNICATIONS)
OF THE SOUTH CENTRAL STATES, INC.)
FOR A MODIFICATION OF THE)
REQUIREMENTS TO PROVIDE INTRALATA)
TOLL DIALING PARITY EFFECTIVE)
MARCH 31, 2000)**

Petition for Waiver

AT&T Communications of the South Central States, Inc. ("AT&T"), pursuant to Section 251(f)(2) of the Communications Act of 1996, as amended (the "Act")(47 U.S.C. §251(f)(2)), hereby requests that the Tennessee Regulatory Authority ("TRA") grant AT&T a waiver for a limited amount of time of certain of the requirements established by the Federal Communications Commission ("FCC") with respect to AT&T's obligations to provide intraLATA toll dialing parity in Tennessee.¹ By this Petition, AT&T is only seeking an extension of time in which to provide new customers who do not select an intraLATA toll carrier the ability to "No PIC" and make intraLATA toll calls using a "dial-around" capability. AT&T plans to implement a new software upgrade allowing this function as part of its AT&T Digital Link service during the first quarter of 2000. All other functions required to provide intraLATA toll dialing parity have been updated and are ready for implementation.

¹ AT&T uses the term "intraLATA toll dialing parity" to refer to the use of software (generally referred to as "2-PIC" software) that permits customers, who wish to select a separate, preferred toll provider for their intraLATA toll calls from that provider carrying the customer's interLATA toll calls. See 47 C.F.R. § 51.209(b); see also Second Report and Order, 11 FCC Rcd at 19419 (paras. 49-50).

Respectfully submitted this 14th day of June, 1999.


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Attorney for
AT&T Communications of the
South Central States, Inc.

TCG Dialing Parity Implementation Plan

TCG hereby files this Dialing Parity Implementation Plan in accordance with the Federal Communications Commission Order released on March 23, 1999, in Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, CC Docket No. 96-98, NSD File No. 98-121. This Plan sets forth TCG's proposal for providing intraLATA toll dialing parity within the state of Tennessee for customers subscribing to TCG services.

Methodology: TCG will provide full 2-PIC (intraLATA toll & interLATA) dialing parity, allowing TCG customers to pre-subscribe to one carrier for all interLATA calls and to the same or another carrier for all intraLATA toll calls. One interLATA IXC and one intraLATA IXC may be selected for each trunk. TCG will also provide a "No PIC" feature, allowing customers the capability to "dial around". TCG will convert all its central offices on a statewide basis.

Availability: TCG will provide full 2-PIC dialing parity in each LATA and exchange in which TCG provides service. TCG local service is offered in all exchanges and LATAs in Tennessee in which TCG is authorized to provide local and intraLATA toll services.

Subscriber Practices: TCG will inform new TCG local service customers of the dialing parity feature and, upon request, will provide customers a randomly ordered list of carriers available to them in their geographic area.

TCG will utilize competitively neutral business office practices when an existing TCG customer contacts TCG to request information on dialing parity or to change to an alternate intraLATA toll. Upon request, TCG will provide customers a randomly ordered list of carriers available to them in their geographic area. Unless an existing TCG subscriber requests a change to their presubscribed intraLATA toll carrier ("PTC"), any intraLATA toll traffic will continue to be carried over TCG's network.

TCG will accept customer-initiated or carrier-initiated requests for alternate intraLATA toll carriers on the date of implementation. If all necessary access facilities already exist, the PTC selection will be processed within three business days. Should the installation of new access facilities (e.g., from the TCG switch to the IXC or from the customer premises to the TCG switch) be required, the PTC selection will be completed within three business days of the new facilities being fully provisioned and operational. The new facilities will be provisioned within standard provisioning intervals.

At this time, TCG will not impose charges on its customers for pre-subscribing to an alternate carrier or for changing their PTC selection.

TCG will provide notice to its subscribers of the forthcoming availability of intraLATA toll dialing parity by means of a one-time mailing, a copy of which is attached as Exhibit 1. This mailing will be sent 15 days prior to the implementation of dialing parity, provided that at least one ASR has been received from an alternate carrier.

Carrier Practices: Any interexchange carrier that wishes to be listed as a provider of intraLATA toll service at the time of dialing parity implementation shall notify TCG no later than 30 days prior to dialing parity availability. Interexchange carriers that wish to offer intraLATA toll service to TCG local customers must establish direct interconnection of its network with the TCG network. Other Access Service Request ("ASR") requirements are available from the TCG Carrier Service Center. TCG will implement ASRs that require the installation of new access facilities in accordance with standard provisioning intervals. TCG will not implement a cost recovery plan at this time.) In addition, TCG will not impose a PIC Change Charge on customers. In keeping with the TRA's anti-slamming rules, TCG will adhere to the TRA anti-slamming rules and implement a PIC freeze moratorium for 180 days. TCG will comply with all rules imposed by the FCC and the TRA.

Proposed Implementation Schedule: TCG will implement dialing parity no later than 30 days after the date of the Order in which this plan is approved.

Exhibit 1

Date

Dear Customer,

As a valued TCG customer we are pleased to announce an enhancement to your TCG service: the availability of intraLATA toll pre-subscription. Pre-Subscription gives you the opportunity to choose an alternate carrier to complete your intraLATA toll calls.

TCG currently completes your intraLATA toll calls, and will continue to do so unless you choose otherwise.

Other companies will solicit your intraLATA toll business. Before making a change, however, please remember that each company's rates, plans and policies are different. If you wish to make a change, please contact our customer service center. You should also contact the intraLATA toll company you have chosen to ensure your account is properly established. This feature is available to you effective [insert date]. TCG will not impose any charges for this feature.

As always, we are grateful for your continued business. If you have any questions or wish to make a change, please contact our business office at 1-888-227-3824 on or after [insert date].

Sincerely,